

Our File No.: 9109/SHV
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL INSURANCE COMPANY and
MARAN, INC.

Plaintiff,
-against-

M/V MSC CHINA her engines, boilers,
tackle, etc. POWER LINK LOGISTICS INC.
SAFMARINE CONTAINER LINES N.V.

Defendants.

08cv1806 (SHS)(HP)

NOTICE OF MOTION

**POWER LINK LOGISTICS'
MOTION FOR SUMMARY
JUDGMENT DISMISSING
THE COMPLAINT ON THE
BASIS OF *FORUM NON
CONVIENENS***

PLEASE TAKE NOTICE that upon the attached Declarations of Stephen Vengrow, Kevin Martin and Lan Hoang and the exhibits annexed thereto, the accompanying Memorandum of Law, and upon the prior pleadings herein, defendant Power Link Logistics will move this Court before the Honorable Judge Stein, United States District Judge, for an order dismissing the claims of Plaintiffs Federal Insurance Company and Maran, Inc. on the basis of *forum non conveniens*, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that opposition and reply papers must be served in accordance with Judge Stein's Order dated April 14, 2008. .

Dated: New York, New York

May 16, 2008

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By: S/ Stephen Vengrow
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